

IN AND FOR THE CIRCUIT COURT OF EIGHTEENTH CIRCUIT ,  
AND FOR SEMINOLE COUNTY, FLORIDA  
CIVIL DIVISION

HEALTH LAW FIRM,  
Plaintiff

Case No:13-CA-3790-15-K

V.

NEELAM UPPAL,  
Defendant

**MOTION TO DISMISS**

COMES NOW, Defendant, Neelam Uppal, filing pro se and moves this court to dismiss this case; and states:

1. The Defendant is a resident of Pinellas County. The cause of action was in Pinellas County. F.S.

47.011, 47.021

2. The Plaintiffs did not file any complaint in Pinellas County.

3. The Plaintiff served the Defendant at her part time employment in New York at not at her home or business in Florida.

4. The Defendant objects to any and all reasons stated by the plaintiff for venue and Jurisdiction as untrue.

4. Plaintiff did not bill the Defendant with the bills attached to Complaint. The service lines are intentionally deleted. The attorney was already paid for the services performed. He had terminated his services and did not provide a retainer. However, he has created a Fraudulent excessive bill pursuant to Florida statute 817.034. This attorney has an extensive precedent record of doing this to his clients.

5. If this motion to Dismiss is denied, the Defendant will file a motion to amend her answer.

WHEREFORE the Defendant prays that this court will grant this motion to dismiss for Lack of



Jurisdiction.

Respectfully submitted,

N. Uppal

Neelam Uppal, pro se

Address: P.O. box 1002

City/State/Zip: Largo, FL - 33779

Phone: 727-403-0022

I CERTIFY that a true and correct copy of the foregoing has been sent via U.S. Mail to the Attorney for the Plaintiff, HealthLawFirm, 1101 Douglas Ave, Almonte Springs, Florida ; on:

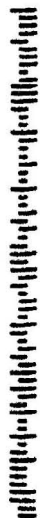
N. Uppal

Neelam Uppal

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